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FEDERAL COMMUNICATIONS COMMISSION

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In the Matter of:)
)
Digital Audio Broadcasting Systems)
And Their Impact on the Terrestrial Radio)
Broadcast Service)

MM Docket 99-325
FCC 99-327

To: The Commission

COMMENTS OF CHANNEL 6 PUBLIC TELEVISION STATIONS

Arkansas Educational Television Commission, Board of Regents for Benefit of the University of Arizona, Central Michigan University, KVIE, Inc., Prairie Public Broadcasting, Inc., and Rocky Mountain Public Broadcasting Network, Inc. (collectively, the "Channel 6 PTV Licensees"), by their attorneys, submit these comments in the above-captioned proceeding.

The Channel 6 PTV Licensees agree with and strongly support the comments filed by the Association of America's Public Television Stations ("APTS") in this proceeding, but file separately due to the importance of this proceeding to the individual Channel 6 station licensees represented in these comments. As explained herein, the Channel 6 PTV Licensees strongly oppose any attempt to reallocate their Channel 6 spectrum for DAB or other new entrant purposes, based on their unique circumstances as public television licensees.

BACKGROUND

In the Notice of Proposed Rulemaking ("NPRM"), the Commission sought comment on whether the six megahertz of spectrum at 82-88 MHz, currently used for TV Channel 6, could be reallocated to DAB service at the end of DTV transition and whether the reallocation would adversely affect the broadcast television service. The Commission stated that, if it pursued a DAB service at 82-88 MHz, it would not permit Channel 6 television stations to elect to keep their existing Channel 6 analog channels.

The Channel 6 PTV Licensees are broadcast licensees of public television stations that operate on TV Channel 6 in the following markets: Mountain View, Arkansas; Tuscon, Arizona; Alpena, Michigan; Minot, North Dakota; Denver, Colorado; and Sacramento, California. The Channel 6 PTV Licensees are a diverse group of licensees with varying service mandates: some serve major markets, while others serve largely rural areas. Some are nonprofit community licensees, some are university licensees and some are governmental entities that provide statewide public television service. The Channel 6 PTV Licensees must make careful use of federal, state and private donations in order to accomplish the transition to DTV. Thus, the Channel 6 PTV Licensees are vitally concerned with the financial and operational challenges that DTV conversion presents for their licensees and for the viewing public that supports their Channel 6 public television stations. The Channel 6 PTV Licensees submit that any reallocation of Channel 6 spectrum will not serve the public interest and will impose unnecessary additional burdens on public television stations on Channel 6 that will impede an orderly transition to DTV.

DISCUSSION

As the Commission acknowledges in footnote 93 of the NPRM, reallocation of TV Channel 6 for DAB or other new entrant purposes would preclude Channel 6 television licensees, like those commenting here, from electing to shift their digital operations to TV Channel 6 at the end of digital transition. The Commission must recognize, however, that precluding use of Channel 6 for DTV at the end of conversion will have adverse consequences for the Channel 6 PTV Licensees in particular.

The most extreme consequence will confront the Channel 6 PTV Licensees that were assigned noncore “paired” DTV Channels. For example, Central Michigan University, licensee of NTSC Channel 6 Station WCML-TV, was assigned DTV Channel *57, Alpena, Michigan, and Prairie Public Broadcasting, Inc., licensee of NTSC Channel 6 Station KSRE, was assigned DTV Channel *57, Minot, North Dakota. Both of these Channel 6 stations are contemplating a return to Channel 6 for DTV operations at the end of DTV transition, in part, due to the uncertainties and costs associated with “non-core” assignments. Both of these Channel 6 stations serve sparsely populated rural areas with the sole public television service available; both stations will face tremendous challenges in finding the necessary public and private funds to make DTV conversion happen. For public broadcasters, like these, that face unique financial hurdles for DTV transition, taking away the option to return to Channel 6 at the end of the conversion will work an extreme hardship.

Moreover, all the Channel 6 PTV Licensees commenting here would like to preserve the option to returning to Channel 6 at the end of DTV conversion for pure cost-efficiency reasons alone. The difference in annual costs of operating a VHF Station on

Channel 6 versus a “replicating” UHF Station on Channel 15-53 is tremendous. The annual power cost alone to operate a UHF station can be more than 1,000 times higher than a VHF operation. For a public broadcaster that needs to make station operations as efficient as possible to survive in the dynamic media marketplace, while finding funds to convert to DTV (and finding funds for the operation of two stations – one analog and one digital—throughout transition), these operational costs are significant budgetary items that will directly affect the amount of funds that the public broadcaster can spend on other budget line items, such as local programming and outreach. The Commission should not force the Channel 6 PTV Licensees to forego more cost-effective VHF operations by reallocating that spectrum to other uses.

In addition, many of the Channel 6 PTV Licensees have concerns about whether their “paired” DTV channel will be able to replicate the service currently provided on TV Channel 6 in the real world. For example, the Channel 6 PTV Licensees are concerned that, even with high powered UHF operations, the signal reach will not approach that of the existing Channel 6 signal. This is a particular concern for stations with viewers and cable systems that are already near the “edge” of the Channel 6 signal; depending on the real world propagation of the DTV UHF signal, some of these viewers and cable systems may no longer be able to receive off-air public television signal. These concerns are made particularly acute by the uncertainty associated with DTV must-carry. Simply put, the Channel 6 PTV Licensees are concerned that reallocation of TV Channel 6 could adversely affect viewer reception and enjoyment of public television.

CONCLUSION

For all these reasons, the Channel 6 PTV Licensees strenuously oppose any reallocation of TV Channel 6, including the reallocation proposed in the NPRM.

Respectfully Submitted,

**ARKANSAS EDUCATIONAL
TELECOMMUNICATIONS COMMISSION**

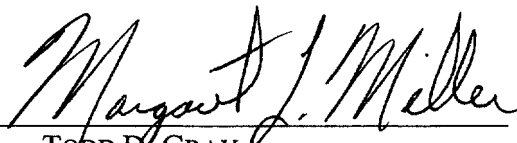
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